

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

LINDA LOUISE CULKIN,

Defendant.

Criminal Case No. 12-CR-10080-GAO

JOINT STATUS REPORT

Pursuant to Local Rule 116.5, the parties have conferred and submit this joint initial status report:

1. The United States provided automatic discovery within the time provided by the local rules. The United States has provided Defendant discovery in addition to that required by the local rules, and will work with Defendant to produce additional discovery as requested.
2. Defendant requires additional time to review the discovery and evaluate whether to request additional discovery.
3. Defendant requires more time to determine whether any pretrial motions will be necessary and on what schedule they could be filed.
4. Defense counsel is working with the U.S. Marshals, the prison facility's staff, and a psychiatrist to obtain tests to analyze Defendant's mental health. The test that Defendant expected to have taken before the June 4, 2013 status conference has not yet been administered.
5. The parties are exploring a possible resolution. Because the parties do not know whether a trial will be necessary, which types of experts would be called, and whether the United

States would need to arrange for foreign witnesses to testify, the parties ask to defer scheduling expert witness disclosures and a trial date until a future status conference before the district court.

6. The parties believe that the Court has excluded all of the time through June 4, 2013, and ask the Court to exclude the time through the date of the next status conference before the district court.

7. As a result of information obtained by the United States from overseas, the parties have discussed whether the United States will supersede the indictment if the case goes to trial.

Respectfully submitted,

Carmen M. Ortiz
United States Attorney

Inga Parsons, Esq.

By: /s/ Scott L. Garland
Scott L. Garland
Assistant U.S. Attorney

/s/ Inga Parsons
Inga Parsons
Counsel for Defendant Culkin

CERTIFICATE OF SERVICE

I hereby certify that this document will be filed through the ECF system and therefore will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Scott L. Garland

Scott L. Garland
Assistant United States Attorney

Date: May 28, 2013